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December 10, 2013

VIA E-MAIL AND U.S. MAIL

The Honorable Katherine B. Forrest
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Travelers Indem. Co. v. Northrop Grumman Corp., et al.*, Case No. 12-cv-3040 (KBF)

Dear Judge Forrest:

Enclosed please find a disc containing a courtesy copy of (1) a hyperlinked version of Century's Memorandum of Law; (2) a hyperlinked version of the Statement of Undisputed Facts; (3) the Declaration of Shane R. Heskin and; (4) exhibits and other materials corresponding to same in support of Century's Motion for Summary Judgment on the Bethpage Facility and Bethpage Community Park, which was filed under seal on November 15, 2013.

In the course of preparing the hyperlinked versions of these documents for submission to the Court, Century discovered a few typographical errors in the Memorandum of Law and the Statement of Undisputed Facts. For the Court's convenience, we have outlined the errors below for your reference:

<u>Memorandum of Law</u>	
Footnote Number	Revision
27	Rather than citing to Exhibit 67, the second citation should reference Exhibit 69.
49	Exhibit 78 is missing the pages cited in this footnote and is also an older version of the Kovarik deposition transcript that is in "rough" form. The hyperlink in the Memorandum of law will link to a revised version of Exhibit 78, which reflects the addition of the missing pages and the transcript in its final form. Rather than attaching the revised version of Exhibit 78 to this letter, we will

	email copies of it to the court and the parties in the case so as to avoid posting confidential information to the docket.
50	Because we are resubmitting Exhibit 78 in its “final” form rather than “rough” form, the pagination of the exhibit has changed. Rather than citing to 139:23-140:12, footnote 50 should reference 144:24-145:16.

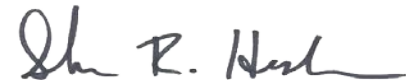
<u>Statement of Undisputed Facts</u>	
Paragraph Number	Revision
17	Rather than citing to NGINS000674116, the citation should reference NGINS000674416.
18	Rather than citing to NGINS000674118, NGINS000674105, NGINS000674157, and NGINS000674163, the citations should reference NGINS000674418, NGINS000674405, NGINS000674457, and NGINS000674463.
19	Rather than citing to NGINS000674122-23, the citation should reference NGINS000674422-23.
41	Rather than citing to CEN00001112, the citation should reference CEN0001132.

Please note that in all cases, the hyperlinks in the Memorandum of Law and Statement of Undisputed Facts will link to the *correct* document or page as outlined above. We apologize for any inconvenience this may have caused the Court.

Century thanks the Court for Your Honor’s consideration of this matter.

Respectfully submitted,

WHITE AND WILLIAMS LLP



Shane R. Heskin

cc: All Counsel (via e-mail)